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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE TREMONT SECURITIES LAW,  
STATE LAW AND INSURANCE  
LITIGATION

Master File No.:  
08 Civ. 11117 (TPG)

This Document Relates to:

State Law Action, No. 08 Civ. 11183 (TPG)

**PLAINTIFF LAKEVIEW INVESTMENTS, LP'S NOTICE OF MOTION  
AND CORRECTED MOTION FOR REMAND OR PARTIAL REMAND  
PURSUANT TO 28 U.S.C. §1447(c) AND 15 U.S.C. §77p(d)(4)  
AND RELATED RELIEF**

## **NOTICE OF MOTION AND MOTION**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to the March 10, 2011 order (“Order”) (Document 16 in No. 1:11-cv-01851-TPG) that had been entered after the action of Plaintiff Lakeview Investments, LP (“Plaintiff”) against Defendant in this action was removed from California state court, and in accordance with Plaintiff’s concurrently filed objection to consolidation under paragraph 15 of this Court’s March 26, 2009 Order on Consolidation (Document 44 in No. 1:08-cv-11117-TPG), Plaintiff hereby files its corrected motion for remand or partial remand pursuant to 28 U.S.C. §1447(c) and 15 U.S.C. §77p(d)(4) and related relief (the “Motion”). Although the Motion was served on defendants’ counsel in No. 1:11-cv-01851-TPG on April 11, 2011, entries in the docket of that action indicate that that the Motion may not have been properly filed electronically due to formatting errors. The undersigned attorney attempted to re-file the Motion on April 13, 2011, but he could not do so because the docket in No. 1:11-cv-01851-TPG had been closed after the action was consolidated with this action. *See* Document 25 in No. 1:11-cv-01851-TPG. In an abundance of caution, Plaintiff is correcting its previously served motion for remand by filing this Motion.

The Motion will be based on the papers and pleadings filed in support thereof, argument of counsel, and such other evidence as may be brought before the Court.

Dated: April 14, 2011

Respectfully submitted,

## LAW OFFICE OF ADAM D. WHITE

By: /s/ Adam D. White

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